Louisville Metro Air Pollution Control District
850 Barret Avenue
Louisville, Kentucky 40204-1745

Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-1568-15-F Plant ID: 1568

Effective Date: Click here to enter a date. Expiration Date: Click here to enter a date.

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

NHK Spring Precision of America, Inc.
10600 Freeport Drive
Louisville, KY 40258

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant: PM
Tons/year: <100

Application No.: 23436 Application Received: 9/29/2008

Permit Writer: Shannon Hosey

Public Notice Date: 2/19/2015

{manager1}
Air Pollution Control Officer
{date1}

Table of Contents

Permit Revisions/Changes

Permit	Revision No.	Issue Date	Public Notice Date	Type	Page No.	Description
O-1568-15-F	NA	xx/xx/2015	02/19/2015	Initial Issuance	All	Initial FEDOOP Permit

Acronyms and Abbreviations

AP-42 - AP-42, *Compilation of Air Pollutant Emission Factors*, published by U.S.EPA
APCD - Louisville Metro Air Pollution Control District
BAC - Benchmark Ambient Concentration
Btu - British thermal unit
CEMS - Continuous Emission Monitoring System
CFR - Code of Federal Regulations
CO - Carbon monoxide
District - Louisville Metro Air Pollution Control District
EA - Environmental Acceptability
gal - U.S. fluid gallons
GHG - Greenhouse Gas
HAP - Hazardous Air Pollutant
HCl - Hydrogen chloride
Hg - Mercury
hr - Hour
in. - Inches
lbs - Pounds
l - Liter
LMAPCD - Louisville Metro Air Pollution Control District
mmHg - Millimeters of mercury column height
MM - Million
NAICS - North American Industry Classification System
NO_x - Nitrogen oxides
PM - Particulate Matter
PM_{10} - Particulate Matter less than 10 microns
$PM_{2.5}$ - Particulate Matter less than 2.5 microns
ppm - parts per million
PSD - Prevention of Significant Deterioration
psia - Pounds per square inch absolute
QA - Quality Assurance
SIC - Standard Industrial Classification
SIP - State Implementation Plan
SO_2 - Sulfur dioxide
STAR - Strategic Toxic Air Reduction
TAC - Toxic Air Contaminant
UTM - Universal Transverse Mercator
VOC - Volatile Organic Compound
w.c. - Water column
year - Any period of twelve consecutive months, unless "calendar year" is specified
yr - Year, or any 12 consecutive-month period, as determined by context

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of applicable fees is not made after receipt of the statement of fees (SOF). The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.

2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.

3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.

4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-0.

5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.

6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.

7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.

8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or an anticipated noncompliance shall not alter any permit requirement.

9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in Section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.

10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM_{10}, $PM_{2.5}$, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA; or any combination of greenhouse gasses whose combined global warming potential equals or exceeds 100,000 tons CO_2-equivalent, as defined in 40 CFR 98). Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.

11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.

12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company. The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.

13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emissions Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.17	Federally Enforceable District Origin Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions

14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption of Federal New Source Performance Standards

15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.

16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.

17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

Air Pollution Control District
Room 205
850 Barret Ave
Louisville, KY 40204-1745

Emission Unit U1

U1 Unit Description: Grinders, Chamfering, Peening Machines and Shot Blaster

U1 Applicable Regulations:

Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
5.00	Definitions	All
5.01	General Provisions	All
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	All
5.21	Environmental Acceptability for Toxic Air Contaminants	All
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	All
5.23	Categories of Toxic Air Contaminants	All
7.08	Standards of Performance for New Process Operations	All

U1 Equipment:

Emission Process ID	Description Make/Model	Applicable Regulation	Control Device (Control ID)
A-4	Edge Grinder, Daisho Seiki Co, model GMV4-915	7.08	OS-4
A-5	Chamfering Maching, Asahi Seikim model AA		OS-6
A-8	Edge Grinder, Asahi Seiki, model AGI2N		
A-9	Edge Grinder, Asahi Seiki, model AGI2N		
A-10	Shot Peening Machine, Sinto Kogio, model SNB-50W with Internal Baghouse		NA
A-12	Shot Peening Machine, Sinto Kogio, model SNB-30 with Internal Baghouse		
B-4	Edge Grinder, Daisho Seiki Co, model GMV4-915		OS-4
B-5A	Chamfering Machine Custom		OS-6
B-5B	Chamfering Machine Custom		
B-6	Shot Peening Machine, Sinto-Kogio, model SNB-30 with Internal Baghouse		NA

Emission Process ID	Description Make/Model	Applicable Regulation	Control Device (Control ID)
B-8	Shot Peening Machine, Sinto-Kogio, model SNB-30 with Internal Baghouse	7.08	NA
C-6	Shot Peening Machine, Sinto-Kogio, model SNB-30 with Internal Baghouse		
C-8	Shot Peening Machine, Sinto-Kogio, model SNB-30 with Internal Baghouse		
D-4	Edge Grinder, Daisho Seiki Co, model GMV4-915		OS-5
D-5	Edge Grinder, Daisho Seiki Co, model GMV4-915		
D-6	Continuous Shot Peening Machine, Itoh Kikoh, model IMD 27		OS-6
GCN-5	Pre-shot Peening Machine, Sinto Kogio, model SNB-30Y with Internal Baghouse		NA
SB-1	Shot Blaster (Dry Horning), Sinto Kogio, model NCF-64U1R		OS-8
OS-1	Cooling Tower, Marley, model 496		NA

U1 Control Device:

Control ID	Description	Pollutant Controlled
OS-4	Donaldson Torit, Baghouse with filter, model DFO 3-3	PM
OS-5	Donaldson Torit, Baghouse with filter, model DFO 3-3	
OS-6	Donaldson Torit, Baghouse with filter, model DFO 3-3	
OS-7	Donaldson Torit, Baghouse with filter, model DFO 3-3	
OS-8	Baghouse	

U1 Specific Conditions

S1. **Standards (Regulation 2.17, section 5.2)**

a. **PM/PM_{10}**

i. The owner or operator shall not allow the plant-wide PM and PM_{10} emissions to equal or exceed 100 tons per 12 consecutive month period. (Regulation 2.17, section 5.1)

ii. The owner or operator shall not allow PM emissions to exceed the following limits based on actual operating hours in a calendar day. (Regulation 7.08, section 3.1.2)

Emission Process ID	Emission Limit (lb/hr)
(A-4) Edge Grinder[1]	2.34 (Operating Permit 168-07-O)
(A-5) Chamfering Machine[1]	2.34 (Operating Permit 168-07-O)
(B-6) Shot Peening Machine[2]	1.15 (Construction Permit 335-06-C)
(B-8) Shot Peening Machine[2]	1.15 (Construction Permit 335-06-C)
(C-6) Shot Peening Machine[2]	1.15 (Construction Permit 335-06-C)
(C-8) Shot Peening Machine[2]	1.15 (Construction Permit 335-06-C)
(D-6) Continuous Shot Peening Machine[2]	3.12 (Construction Permit 335-06-C)
(GCN-5) Pre-shot Peening Machine[2]	4.80 (Construction Permit 335-06-C)
(B-4) Grinder[2]	0.49 (Construction Permit 333-06-C)
(D-4 and D-5) Grinders[2]	0.98 (Construction Permit 333-06-C)
(A-8 and A-9) Grinders[2]	0.36 (Construction Permit 333-06-C)
(B-5A) Chamfering Machines[2]	0.585 (Construction Permit 333-06-C)

1 A one-time PM compliance demonstration was performed and the lb/hr standards cannot be exceeded uncontrolled for this process. Therefore, there are no monitoring, record keeping, or reporting requirements with respect to the PM lb/hr limits.

2 A one-time compliance demonstration has been performed for each piece of equipment for PM, and the lb/hr standards cannot be exceeded controlled. Therefore, the control devices will be operated as needed to meet the lb/hr standard.

(B-5B) Chamfering Machines[2]	0.585 (Construction Permit 333-06-C)
(A-10) Shot Peening Machine[3]	2.34 (Operating Permit 172-07-O)
(A-12) Shot Peening Machine[3]	2.34 (Operating Permit 172-07-O)
(SB-1) Shot Blaster[3]	2.34 (Operating Permit 170-07-O)
(OS-1) Cooling Tower[3]	2.34 (Operating Permit 172-07-O)

iii. The owner or operator shall not allow the pressure drop to fall outside of the ranges listed below for each baghouse: (Regulation 2.17, section 5.1)

Baghouse	Range
OS-4	0.2 to 8
OS-5	0.8 to 5
OS-6	0.2 to 8
OS-7	0.2 to 8
OS-8	0.2 to 8

iv. The owner or operator shall operate and maintain the control device at all times an associated emission point is in operation, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practice for minimizing emissions.. (Regulation 2.17, section 5.1)

b. **Opacity**

The owner or operator shall not cause or permit the discharge of emissions equal to or in excess of 20% opacity. (Regulation 7.08, section 3.1.1)

c. **TAC**

i. The owner or operator shall not allow Nickel emissions to exceed 9.501 lb/yr for the edge grinders (A-4 and B-4). (Regulation 5.21, Section 4.3) (See Comment 1)

ii. The owner or operator shall not allow Nickel emissions to exceed 11.103 lb/yr for the edge grinders (D-4 and D-5). (Regulation 5.21, Section 4.3) (See Comment 1)

3 A one-time PM compliance demonstration was performed and the lb/hr standards cannot be exceeded uncontrolled for this process. Therefore, there are no monitoring, record keeping, or reporting requirements with respect to the PM lb/hr limits.

iii. The owner or operator shall not allow Nickel emissions to exceed 12.668 lb/yr for the edge grinders (A-8 and A-9). (Regulation 5.21, Section 4.3) (See Comment 1)

iv. The owner or operator shall not allow Nickel emissions to exceed 5.467 lb/yr for the chamfering machine (A-5). (Regulation 5.21, Section 4.3) (See Comment 1)

v. The owner or operator shall not allow Nickel emissions to exceed 2.733 lb/yr for the chamfering machine (B-5A and B-5B). (Regulation 5.21, Section 4.3) (See Comment 1)

vi. The owner or operator shall not allow Nickel emissions to exceed 2.178 lb/yr for the shot peening machine (D-6). (Regulation 5.21, Section 4.3) (See Comment 1)

vii. The owner or operator shall not allow Nickel emissions to exceed 2.723 lb/yr for the chamfering maching (SB-1). (Regulation 5.21, Section 4.3) (See Comment 1)

viii. The owner or operator shall not allow Manganese emissions to exceed 27.758 lb/yr for the edge grinders (D-4 and D-5). (Regulation 5.21, Section 4.3) (See Comment 1)

ix. The owner or operator shall not allow Manganese emissions to exceed 31.670 lb/yr for the edge grinders (A-8 and A-9). (Regulation 5.21, Section 4.3) (See Comment 1)

x. The owner or operator shall not allow Chromium III emissions to exceed 109.5 lb/yr and 0.10 lb/hr for Emission Processes A-4, B-4, C-4, D-4, D-5, A-8, A-9, A-5, B-5A, B-5B, D-6 and SB-1. (Regulation 5.21, Section 4.3) (See Comment 1)

xi. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

xii. The owner or operator shall utilize the control device at all times the process is in operation and shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions[4].

4 The source submitted an updated plant-wide STAR Environmental Acceptability Demonstration (EA Demo) received on May 01, 2013. The EA Demo used SCREEN3 air dispersion modeling for Category 1 TAC Nickel and Category 2 TAC Manganese. All other TACs for the grinding and chamfering of springs were found to be de minimis

S2. **Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

a. **PM**

i. The owner or operator shall daily monitor and record the pressure drop in inches water column of each baghouse to stay in the appropriate range for each baghouse. (OS-4, OS-5, OS-6, OS-7 and OS-8)

ii. The owner or operator shall keep a daily record of the number and type of springs that are ground by each grinding and chamfering machine.

iii. The owner or operator shall maintain daily records of any periods of time where the process was operating and the control device was not operating.

iv. If there is any time that the control device is not in operation when the process is operating, then the owner or operator shall keep a record of the following for each event:

1) Date;
2) Start time and stop time;
3) Identification of the control device and process equipment;
4) PM emissions for each hour during the event in lb/hr;
5) Summary of the cause or reason for each event;
6) Corrective action taken to minimize the extent or duration of the event; and
7) Measures implemented to prevent reoccurrence of the situation that resulted in the event.

v. The owner or operator shall monthly calculate and record the monthly and 12 consecutive month PM_{10} emissions for each the edge grinder and chamfering machine using the following equations for controlled emissions or other methods approved in writing by the District:

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when controlled. For Nickel emitted from the grinder, the single process industrial property R_C is 0.702 (max EAG_C, 10.0) and the single process residential property R_C is 0.178 (max EAG_C, 1.0). For Nickel emitted from the chamfering machine, the single process industrial property R_C is 0.151 (max EAG_C, 10.0) and the single process residential property R_C is 0.036 (max EAG_C, 1.0). The cumulative industrial R_C is 8.57 (max EAG_C, 38.0) and the cumulative residential R_C is 2.15 (max EAG_C, 3.8). For Manganese, the single process industrial property HQ is 0.133 (max EAG_C, 10.0), single process residential property HQ is 0.034 (max EAG_C, 1.0), cumulative industrial HQ is 1.167 (max EAG_C, 38.0), and cumulative residential HQ is 0.297 (max EAG_C, 3.8). The cumulative industrial HQ is 0.652, which is below the applicable 3.0, and the cumulative residential HQ is 0.163, which is below 1.0. The environmental acceptability for this process, and this plant, has been demonstrated.

For the Edge Grinders:

$$PM_{SmallVSGrinder} = \left(\frac{\#\ springs}{month}\right)\left(\frac{lb}{spring}\right)(0.0849)\left(1 - CE_{Baghouse}\right)(1 - CE_{Filter})$$

For the Chamfering Machines:

$$PM_{Chamfering} = \left(\frac{\#\ springs}{month}\right)\left(\frac{lb}{spring}\right)(0.015)\left(1 - CE_{Baghouse}\right)(1 - CE_{Filter})$$

Where,

# springs/month	= The sum of the daily number of each type of springs processed for each piece of equipment for the month.
lb/spring	= The average weight of each type of spring (0.0644 lb/spring for valve spring, VS, for grinding operations and 0.060 lb/spring for valve spring, VS, for chamfering operations).
EF (0.0849)	= Emission factor for the small valve spring grinders representing pounds of PM generated per pound of springs processed (lb PM/lb springs).
EF (0.015)	= Emission factor for the chamfering machine representing pounds of PM generated per pound of springs processed (lb PM/lb springs).
$CE_{Bagouse}$	= 0.95 for baghouses, unless stack testing indicated a different value.
CE_{Filter}	= 0.90 for other filters, unless stack testing indicates a different value.

vi. The owner or operator shall, monthly, calculate and record the plant-wide and 12 consecutive month PM_{10} emissions to ensure ongoing compliance with the 100 tpy plant-wide limit.

b. **Opacity**

i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of each emission point. No more than four (4) emission points shall be observed simultaneously. The

opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.

ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight (8) hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within twenty-four (24) hours of the initial observation.

iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what, if any, corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

c. **TAC**

i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.

ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases above de minimis uncontrolled.

iii. If there is any time that the control device is not in operation when the process is operating, then the owner or operator shall keep a record of the following for each event:

1) Date;
2) Start time and stop time;
3) Identification of the control device and process equipment;
4) Each TAC emission during the event in lb/hr and lb/yr;
5) Summary of the cause or reason for each event;
6) Corrective action taken to minimize the extent or duration of the event; and
7) Measures implemented to prevent reoccurrence of the situation that resulted in the event.

S3. **Reporting (Regulation 2.17, section 5.2)**

The owner or operator shall submit annual compliance reports in accordance with General Condition 12.

a. **PM**

i. The owner or operator shall specify whenever the values of the gauges are outside of the range for each baghouse.

ii. The owner or operator shall clearly identify all deviations from permit requirements in the annual report and include the following information:

1) Emission unit ID number and emission point ID number;
2) Identification of all times the baghouse is not in operation and exceeded the lb/hr PM limit;
3) Calculated lb/hr PM emissions during the event;
4) Reason for excess emissions; and
5) Description of corrective action taken to prevent future exceedances.
6) Monthly and 12 consecutive month PM_{10} emissions for each month in the reporting period;
7) Identification of all periods of exceeding the PM and PM_{10} emission limits; and
8) Description of corrective action taken to prevent future exceedances.
9) A negative declaration if no deviations occur during the reporting period.

b. **Opacity**

i. Emission Unit number and Emission Point number for each exceedance;
ii. The beginning and ending date of the reporting period;
iii. The number of surveys where visible emissions were observed;
iv. The date, time, and results of each Method 9 that exceeded the opacity standard; and
v. Description of any corrective action taken for each exceedance.

c. **TAC**

i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.

ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability

Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)

iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months after a change of a raw material as described in S2.c.ii.

U1 Comments

1. The following table shows how the source is compliant with STAR for the applicable TACS emitted.

TAC	De minimis, lb/yr	De minimis, lb/hr	De minimis Uncontrolled?	De minimis Controlled?	Modeling Performed?
Aluminum	1095	1.0	Yes	-	-
Chromium III	109.5	0.10	No	Yes	-
Copper	43.8	0.04	Yes	-	-
Manganese	24	0.027	No	No[1]	Yes[2]
Nickel	1.82	0.002	No	No[3]	Yes[4]

Note 1: Manganese was de minimis for the hourly standard controlled.
Note 2: Modeling for Manganese was performed at a controlled potential of 27.758 lb/yr (D-4 and D-5) and 31.670 lb/yr (A-8 and A-9).
Note 3: Nickel was de minimis for the hourly standard controlled.
Note 4: Modeling for Nickel was performed at a controlled potential of 9.501 lb/yr (A-4 and B-5), 3.167 lb/yr (C-4), 11.103 lb/yr (D-4 and D-5), 12.668 lb/yr (A-8 and A-9), 5.467 lb/yr (A-5), 2.733 lb/yr (B-5A and B-5B), 2.718 lb/yr (D-6) and 2.723 lb/yr (SB-1).

Emission Unit U2

U2 Unit Description: Grinders and Chamfering Machine

U2 Applicable Regulations:

Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
5.00	Definitions	All
5.01	General Provisions	All
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	All
5.21	Environmental Acceptability for Toxic Air Contaminants	All
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	All
5.23	Categories of Toxic Air Contaminants	All
7.08	Standards of Performance for New Process Operations	All

U2 Equipment:

Emission Process ID	Description Make/Model	Applicable Regulation	Control Device (Control ID)
C-14	Edge Grinder, Asahi-Seiki, model AG12N	7.08	OS-6
C-15	Edge Grinder, Asahi-Seiki, model AG12N		
C-16	Edge Grinder, Asahi-Seiki, model AG12N		
C-17	Chamfering Machine, Asahi-Seiki, model AG12N		
C-18	Edge Grinder, Asahi-Seiki, model AG12N		
C-19	Edge Grinder, Asahi-Seiki, model AG12N		

U2 Control Device:

Control ID	Description	Pollutant Controlled
OS-6	Donaldson Torit, Baghouse with filter, model DFO 3-3	PM

U2 Specific Conditions

S1. **Standards (Regulation 2.17, section 5.2)**

a. **PM/PM_{10}**

i. The owner or operator shall not allow the plant-wide PM and PM_{10} emissions to equal or exceed 100 tons per 12 consecutive month period. (Regulation 2.17, section 5.1)

ii. The owner or operator shall not allow PM emissions to exceed the following limits based on actual operating hours in a calendar day. (Regulation 7.08, section 3.1.2)

Emission Process ID	Emission Limit (lb/hr)
(C14) Edge Grinder[5]	2.34 (Construction Permit 35474-12-C(R1))
(C-15) Edge Grinder[5]	2.34 (Construction Permit 35941-12-C(R1))
(C-16) Edge Grinder[5]	2.34 (Construction Permit 35941-12-C(R1))
(C-17) Chamfering Machine[5]	2.34 (Construction Permit 35941-12-C(R1))
(C18) Edge Grinder[5]	2.34 (Construction Permit 37302-13-C)
(C19) Edge Grinder[5]	2.34 (Construction Permit 37302-13-C)

iii. The owner or operator shall not allow the pressure drop to fall outside of the range listed below for the baghouse: (Regulation 2.17, section 5.1)

Baghouse	Range
OS-6	0.2 to 8

iv. The owner or operator shall operate and maintain the control device at all times an associated emission point is in operation, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practice for minimizing emissions

b. **Opacity**

The owner or operator shall not cause or permit the discharge of emissions equal to or in excess of 20% opacity. (Regulation 7.08, section 3.1.1)

5 A one-time compliance demonstration has been performed for each piece of equipment for PM, and the lb/hr standards cannot be exceeded controlled. Therefore, the control devices will be operated as needed to meet the lb/hr standard.

c. **TAC**

i. The owner or operator shall not allow Nickel emissions to exceed 2.733 lb/yr for the chamfering machine (C-17). (Regulation 5.21, Section 4.3) (See Comment 1)

ii. The owner or operator shall not allow Manganese emissions to exceed 24 lb/yr and 0.027 lb/hr for the chamfering machine (C-17). (Regulation 5.21, Section 4.3) (See Comment 1)

iii. The owner or operator shall not allow Chromium III emissions to exceed 109.5 lb/yr and 0.10 lb/hr for the chamfering machine (C-17). (Regulation 5.21, Section 4.3) (See Comment 1)

iv. The owner or operator shall not allow Nickel emissions to exceed 12.668 lb/yr for each edge grinder (C-14, C-15, C16, C-18 and C-19). (Regulation 5.21, Section 4.3) (See Comment 2)

v. The owner or operator shall not allow Manganese emissions to exceed 31.670 lb/yr for each edge grinder (C-14, C-15, C16, C-18 and C-19). (Regulation 5.21, Section 4.3) (See Comment 2)

vi. The owner or operator shall not allow Chromium III emissions to exceed 109.5 lb/yr and 0.10 lb/hr for each edge grinder (C-14, C-15, C16, C-18 and C-19). (Regulation 5.21, Section 4.3) (See Comment 2)

vii. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.01 and 5.21)

viii. The owner or operator shall utilize the control device at all times the process is in operation and shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions[6].

6 The source submitted an updated plant-wide STAR Environmental Acceptability Demonstration (EA Demo) received on May 01, 2013. The EA Demo used SCREEN3 air dispersion modeling for Category 1 TAC Nickel and Category 2 TAC Manganese. All other TACs for the grinding and chamfering of springs were found to be de minimis when controlled. For Nickel emitted from the grinder, the single process industrial property R_C is 0.702 (max EAG_C, 10.0) and the single process residential property R_C is 0.178 (max EAG_C, 1.0). For Nickel emitted from the chamfering machine, the single process industrial property R_C is 0.151 (max EAG_C, 10.0) and the single process residential property R_C is 0.036 (max EAG_C, 1.0). The cumulative industrial R_C is 8.57 (max EAG_C, 38.0) and the cumulative residential R_C is 2.15 (max EAG_C, 3.8). For Manganese, the single process industrial property HQ is 0.133 (max EAG_C, 10.0), single process residential property HQ is 0.034 (max EAG_C, 1.0), cumulative industrial HQ is 1.167 (max EAG_C, 38.0), and cumulative residential HQ is 0.297 (max EAG_C, 3.8). The cumulative industrial HQ is 0.652, which is below the applicable 3.0, and the cumulative residential HQ is 0.163, which is below 1.0. The environmental acceptability for this process, and this plant, has been demonstrated.

S2. **Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

a. **PM/PM_{10}**

i. The owner or operator shall daily monitor and record the pressure drop in inches water column of the baghouse to stay in the range of 0.2 to 8. (OS-6).

ii. The owner or operator shall keep a daily record of the number and type of springs that are ground by each grinding and chamfering machine.

iii. The owner or operator shall maintain daily records of any periods of time where the process was operating and the control device was not operating.

iv. If there is any time that the control device is not in operation when the process is operating, then the owner or operator shall keep a record of the following for each event:

1) Date;
2) Start time and stop time;
3) Identification of the control device and process equipment;
4) PM emissions for each hour during the event in lb/hr;
5) Summary of the cause or reason for each event;
6) Corrective action taken to minimize the extent or duration of the event; and
7) Measures implemented to prevent reoccurrence of the situation that resulted in the event.

v. The owner or operator shall monthly calculate and record the monthly and 12 consecutive month PM_{10} emissions for each the edge grinder and chamfering machine using the following equations for controlled emissions or other methods approved in writing by the District:

For the Edge Grinders:

$$PM_{SmallVSGrinder} = \left(\frac{\#\ springs}{month}\right)\left(\frac{lb}{spring}\right)(0.0849)\left(1 - CE_{Baghouse}\right)(1 - CE_{Filter})$$

For the Chamfering Machine:

$$PM_{Chamfering}$$

$$= \left(\frac{\#\ springs}{month}\right)\left(\frac{lb}{spring}\right)(0.015)\left(1 - CE_{Baghouse}\right)(1 - CE_{Filter})$$

Where,

springs/month = The sum of the daily number of each type of springs processed for each piece of equipment for the month.

lb/spring = The average weight of each type of spring (0.0644 lb/spring for valve spring, VS, for grinding operations and 0.060 lb/spring for valve spring, VS, for chamfering operations).

EF (0.0849) = Emission factor for the small valve spring grinders representing pounds of PM generated per pound of springs processed (lb PM/lb springs).

EF (0.015) = Emission factor for the chamfering machine representing pounds of PM generated per pound of springs processed (lb PM/lb springs).

$CE_{Bagouse}$ = 0.95 for baghouses, unless stack testing indicated a different value.

CE_{Filter} = 0.90 for other filters, unless stack testing indicates a different value.

vi. The owner or operator shall, monthly, calculate and record the plant-wide and 12 consecutive month PM_{10} emissions to ensure ongoing compliance with the 100 tpy plant-wide limit.

b. **Opacity**

i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of each emission point. No more than four (4) emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.

ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight (8) hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within twenty-four (24) hours of the initial observation.

iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what, if any, corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

c. **TAC**

i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.

ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

iii. If there is any time that the control device is not in operation when the process is operating, then the owner or operator shall keep a record of the following for each event:

1) Date;
2) Start time and stop time;
3) Identification of the control device and process equipment;
4) Each TAC emission during the event in lb/hr and lb/yr;
5) Summary of the cause or reason for each event;
6) Corrective action taken to minimize the extent or duration of the event; and
7) Measures implemented to prevent reoccurrence of the situation that resulted in the event.

S3. **Reporting (Regulation 2.17, section 5.2)**

The owner or operator shall submit annual compliance reports in accordance with General Condition 12.

a. **PM**

i. The owner or operator shall specify whenever the values of the gauges are outside of the range.

ii. The owner or operator shall clearly identify all deviations from permit requirements in the annual report and include the following information:

1) Emission unit ID number and emission point ID number;

2) Identification of all times the baghouse is not in operation and exceeded the lb/hr PM limit;
3) Calculated lb/hr PM emissions during the event;
4) Reason for excess emissions; and
5) Description of corrective action taken to prevent future exceedances.
6) Monthly and 12 consecutive month PM_{10} emissions for each month in the reporting period;
7) Identification of all periods of exceeding the PM and PM_{10} emission limits; and
8) Description of corrective action taken to prevent future exceedances.
9) A negative declaration if no deviations occur during the reporting period.

b. **Opacity**

i. The number of surveys where visible emissions were observed;
ii. The date, time, and results of each Method 9 that exceeded the opacity standard; and
iii. Description of any corrective action taken for each exceedance.

c. **TAC**

i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.

ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)

iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.c.ii.

iv. The owner or operator shall clearly identify all deviations from permit requirements in the annual report and include the following information:

1) Emission unit ID number and emission point ID number;
2) Identification of all times the baghouse is not in operation and exceeded the any lb/hr or lb/yr TAC limit;

3) Calculated lb/hr and lb/yr for each TAC emission during the event;
4) Reason for excess emissions; and
5) Description of corrective action taken to prevent future exceedances.
6) A negative declaration if no deviations occur during the reporting period.

U2 Comments

1. The following table shows how the source is compliant with STAR for the applicable TACS emitted using the chamfering machine.

TAC	De minimis, lb/yr	De minimis, lb/hr	De minimis Uncontrolled?	De minimis Controlled?	Modeling Performed?
Aluminum	1095	1.0	Yes	-	-
Chromium III	109.5	0.10	No	Yes	-
Copper	43.8	0.04	Yes	-	-
Manganese	24	0.027	No	Yes	-
Nickel	1.82	0.002	No	No[1]	Yes[2]

Note 1: Nickel was de minimis for the hourly standard controlled.
Note 2: Modeling for Nickel was performed at a controlled potential of 2.73 lb/yr.

2. The following table shows how the source is compliant with STAR for the applicable TACS emitted using the edge grinders.

TAC	De minimis, lb/yr	De minimis, lb/hr	De minimis Uncontrolled?	De minimis Controlled?	Modeling Performed?
Aluminum	1095	1.0	Yes	-	-
Chromium III	109.5	0.10	No	Yes	-
Copper	43.8	0.04	Yes	-	-
Manganese	24	0.027	No	No[1]	Yes[2]
Nickel	1.82	0.002	No	No[3]	Yes[4]

Note 1: Manganese was de minimis for the hourly standard controlled.
Note 2: Modeling for Manganese was performed at a controlled potential of 31.670 lb/yr.
Note 3: Nickel was de minimis for the hourly standard controlled.
Note 4: Modeling for Nickel was performed at a controlled potential of 12.668 lb/yr.

Emission Unit U3

U3 Unit Description: Anti-Corrosion Coating and Paint/Ink Marking Operation, which is done in four (4) inspection machines.

U3 Applicable Regulations:

Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
5.00	Definitions	All
5.01	General Provisions	All
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	All
5.21	Environmental Acceptability for Toxic Air Contaminants	All
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	All
5.23	Categories of Toxic Air Contaminants	All
7.08	Standards of Performance for New Process Operations	All
7.59	Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	All

U3 Equipment:

Emission Process ID	Description Make/Model	Applicable Regulation	Control Device (Control ID)
A-17	Inspection Machine	7.08 and 7.59	NA
B-13	Inspection Machine		
C-13	Inspection Machine		
D-13	Inspection Machine		

U3 Specific Conditions

S1. **Standards (Regulation 2.17, section 5.2)**

a. **VOC**

The owner or operator shall not use more than 321 gallons of ink and 1286 gallons of anti-corrosion coating per year unless compliance with Specific Condition S2.a.ii. is met. The owner or operator shall not allow or cause VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from this plant to exceed 5 tons during any calendar year, unless compliant coatings are used. (Construction Permit 347-05-C) (Regulation 7.59, section 5.2)

b. **PM/PM_{10}**

i. The owner or operator shall not allow the plant-wide PM and PM_{10} emissions to equal or exceed 100 tons per 12 consecutive month period. (Regulation 2.17, section 5.1)

ii. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr for each piece of equipment based on actual operating hours in a calendar day [7]. (Regulation 7.08, section 3.1.2)

c. **Opacity**

The owner or operator shall not cause or permit the discharge of emissions equal to or in excess of 20% opacity. (Regulation 7.08, section 3.1.1)

d. **TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis[8]. (Regulations 5.00 and 5.21)

S2. **Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

7 A one-time PM compliance demonstration was performed and the lb/hr standards cannot be exceeded uncontrolled for any of these processes. Therefore, there are no monitoring, record keeping, or reporting requirements with respect to the PM lb/hr limits.

8 The TACs emitted from the inspection machines are de minimis uncontrolled.

a. **VOC**

i. The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc. and calculate the amount of VOC containing material used during the 12 consecutive month period.

ii. If the usage rate of VOC containing materials exceeds any of the gallons per year limits, the owner or operator shall calculate the year to date VOC emissions and subsequently calculate the monthly and year to date VOC emissions each month for the remainder of the calendar year.

iii. An owner or operator of an affected facility subject to this regulation shall maintain records that include, but not be limited to, the following: (Regulation 7.59, section 6.1)

1) The regulation and section number applicable to the affected facility for which the records are being maintained,

2) The application method and substrate type (metal, plastic, etc.),

3) The amount and type of coatings (including catalyst and reducer for multi-component coatings) and solvent (including exempt compounds) used at each point of application during the month.

4) The VOC content as applied in each coating and solvent,

5) The date, or usage record period, for each application of coating and solvent,

6) The amount of surface preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each material used during the month.

iv. The VOC content shall be calculated using a percent solids basis (excluding water and exempt solvents) for coatings using EPA Method 24. (Regulation 7.59, section 6.2)

b. **PM/PM_{10}**

The owner or operator shall, monthly, calculate and record the plant-wide and 12 consecutive month PM_{10} emissions to ensure ongoing compliance with the 100 tpy plant-wide limit.

c. **Opacity**

There are no monitoring or record keeping requirements for this pollutant for this equipment[9].

d. **TAC**

i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.

ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases above *de minimis*.

S3. **Reporting (Regulation 2.17, section 5.2)**

The owner or operator shall submit annual compliance reports in accordance with General Condition 12.

a. **VOC**

i. The emission unit ID numbers and emission process ID numbers;
ii. The total plant-wide 12 consecutive month VOC emissions for each month in the reporting period;
iii. Identification of all periods of exceedance of the VOC emissions limits; and
iv. A description of corrective actions taken for each exceedance.

b. **PM**

The owner or operator shall report the plant-wide 12-consecutive month PM emission for each month in the report period to demonstrate compliance with Regulation 2.17.

c. **Opacity**

There are no reporting requirements for this pollutant for this emission unit.

d. **TAC**

i. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability

9 The District has determined that no periodic visible emissions surveys are required for this equipment.

Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)

ii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.d.ii.

Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all the conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance.

Off-Permit Documents

There are no off-permit documents associated with this permit.

Alternative Operating Scenario

The company requested no alternate operating scenario in its FEDOOP Application.

Insignificant Activities

Equipment	Quantity	PTE (tpy)	Basis for Exemption
Parts Washer (IA-1)	1	0.424	Regulation 1.02, Appendix A, section 1.38.1.1

1) Insignificant activities identified in District Regulation 1.02 Appendix A may be subject to size or production rate disclosure requirements.

2) Insignificant activities identified in District Regulation 1.02 Appendix A shall comply with generally applicable requirements.

3) Activities identified in regulation 1.02, Appendix A, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the permit.

4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.

5) In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the pollutant Potential To Emit (PTE) quantity listed in the Insignificant Activities table, as the annual emission for each piece of equipment, since the emissions from the source's Insignificant Activities are very minor in comparison to the plant wide emissions.

6) The owner or operator shall annually submit an updated list of Insignificant Activities, including an identification of the additions and removals of Insignificant Activities that occurred during the preceding year, with the compliance certification due April 15th.

Emission Unit IA-1

IA-1 Unit Description: Parts Washer with no secondary reservoir

IA-1 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
2.17	Federally Enforceable District Origin Operating Permits	All
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	1, 2, 3, 4.1, 4.2

IA-1 Equipment:

Emission Process	Description	Applicable Regulation	Control ID
E26	Heritage, Crystal Clean Parts Washer	6.18	N/A

IA-1 Control Devices:

There are no control devices associated with Emission Unit IA-1.

IA-1 Specific Conditions

S1. **Standards (Regulation 2.17, section 5.2)**

a. **VOC**

i. The owner or operator shall install, maintain, and operate the control equipment as follows: (Regulation 6.18, section 4)

1) The cold cleaner shall be equipped with a tightly fitting cover that is free of cracks, holes, or other defects. If the solvent is agitated or heated, then the cover shall be designed so that it can be easily operated with 1 hand. (Regulation 6.18, section 4.1.1)

2) The cold cleaner shall be equipped with a drainage facility that is designed so that the solvent that drains off parts removed from the cleaner will return to the cold cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system. (Regulation 6.18, section 4.1.2)

3) A permanent, conspicuous label summarizing the operating requirements specified in Specific Condition S1.a.ii. shall be installed on or near the cold cleaner. (Regulation 6.18, section 4.1.3)

4) If used, the solvent spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaner. Solvent flow shall be directed downward to avoid turbulence at the air-solvent interface and to prevent solvent from splashing outside of the cold cleaner. (Regulation 6.18, section 4.1.4)

5) Work area fans shall be located and positioned so that they do not blow across the opening of the cold cleaner. (Regulation 6.18, section 4.1.6)

6) The solvent-containing portion of the cold cleaner shall be free of all liquid leaks. Auxiliary cold cleaner equipment such as pumps, water separators, steam traps, or distillation units shall not have any visible liquid leaks, visible tears, or cracks. (Regulation 6.18, section 4.1.8)

ii. The owner or operator shall observe at all times the following operating requirements: (Regulation 6.18, section 4.2)

1) Waste solvent shall neither be disposed of nor transferred to another party in a manner such that more than 20% by weight of the waste solvent can evaporate. Waste solvent shall be stored only in a covered container. A covered container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. (Regulation 6.18, section 4.2.1)

2) The solvent level in the cold cleaner shall not exceed the fill line. (Regulation 6.18, section 4.2.2)

3) The cold cleaner cover shall be closed whenever a part is not being handled in the cold cleaner. (Regulation 6.18, section 4.2.3)

4) Parts to be cleaned shall be racked or placed into the cold cleaner in a manner that will minimize drag-out losses. (Regulation 6.18, section 4.2.4)

5) Cleaned parts shall be drained for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. (Regulation 6.18, section 4.2.5)

6) A spill during solvent transfer shall be cleaned immediately, and the wipe rags or other sorbent material shall be immediately stored in a covered container for disposal or recycling, unless enclosed storage of these items is not allowed by fire protection authorities. (Regulation 6.18, section 4.2.6)

7) Sponges, fabric, wood, leather, paper products, and other absorbent material shall not be cleaned in a cold cleaner. (Regulation 6.18, section 4.2.7)

iii. The owner or operator shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20EC (68EF). (Regulation 6.18, section 4.3.2)

S2. **Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. **VOC**

i. The owner or operator shall maintain records that include the following for each purchase: (Regulation 6.18, section 4.4.2)

1) The name and address of the solvent supplier,
2) The date of the purchase,
3) The type of the solvent, and
4) The vapor pressure of the solvent measured in mm Hg at 20EC (68EF).

ii. All records required in Specific Condition S2.a.i. shall be retained for 5 years and made available to the District upon request. (Regulation 6.18, section 4.4.3)

S3. **Reporting (Regulation 2.17, section 5.2)**

a. **VOC**

There are no routine compliance reporting requirements for Regulation 6.18.

FEDOOP Fee Comment

As stated in Regulation 2.08, section 12, as of May 15, 2013, the District has adopted a new fee structure. As a result, NHK Spring Precision will be required to pay initial issuance fees as well as annual fees.

The initial issuance and STAR De Minimis fee for a FEDOOP is $2,847.50 in accordance with the *Schedule of Fees* table in Regulation 2.08. This fee shall be paid to the District prior to the issuance of the permit.

Fee Type	Amount
Permit Actions: Significant Permit Revision (includes initial issuance)	$2,542.40
STAR Program: De Minimis Determination Only (Per TAC)	$305.10